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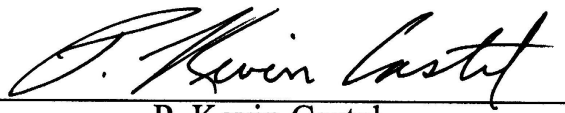
December 26, 2019

**Via ECF and Fax (212-805-7949)**

Hon. P. Kevin Castel  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Application granted.  
SO ORDERED.

December 26, 2019

  
P. Kevin Castel  
United States District Judge

Lauren.Boulbol@clydeco.us

**Re:** *AIG Property Casualty Company v. Artex Inc. and Artex Fine Art Services*  
**Docket No.:** 1:19-cv-01969-PKC-HBP

Dear Judge Castel:

This office represents Defendants, Artex, Inc. and Artex Fine Art Services. We write to seek an adjournment of the court's deadline to file a motion to join additional parties. Pursuant to the court's case management order, that deadline is December 26, 2019. This request is necessitated by the failure of Plaintiff to identify potentially liable third parties as required in the court's case management order.

Specifically, it was ordered that "Plaintiff will provide information regarding other contractors present during delivery and who inspected/opened the box by December 20, 2019." While Plaintiff did timely serve their initial disclosures, they did not specifically identify the parties present at delivery or responsible for inspecting or opening the box containing the artwork.

This office did not receive this information by Friday, December 20, 2019. On Monday, December 23, 2019 this office sent a follow-up email to Kristian Alfonso (counsel of record for Plaintiff) and received an "out of office" reply. In accordance with the instructions of the out of office, the follow-up was forwarded to [abradshaw@clausen.com](mailto:abradshaw@clausen.com). As of filing, we have not received the information identified in the case management order. It is Defendants' position that other persons present and responsible for opening/inspecting the box may be responsible, in whole or in part, for Plaintiff's alleged damages and should therefore be a party to this litigation and contemplated mediation scheduled for next month. Therefore, Defendants seek the

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adjournment of the deadline to assert claims against third parties to January 9, 2020 to allow Plaintiff an opportunity to furnish this information.

No previous request for this relief has been made.

Respectfully Submitted,



Lauren Elizabeth Boulbol  
LEB/jr